REMARKS

Amendments

Amendments to the Claims

Applicant has amended the claims to more particularly point out what Applicant regards as the invention. Specifically, the invention as claimed provides that the brightness map is approximated from a bi-linear interpolation of the raw image. No new matter has been added as a result of these amendments.

Rejections

Rejections under 35 U.S.C. § 103

Claims 1-16, 18, and 19

Claims 1-16, 18, and 19 stand rejected under 35 U.S.C. § 103(a) as being obvious over Acharya, U.S. Patent No. 6,108,453 (previously cited) and Kamei et al., U.S. Patent 5,528,698 (previously cited). Applicant respectfully submits that the combination of Acharya and Kamei does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 1-16, 18, and 19.

Acharya discloses enhancing a raw image by combining an enhanced map of the image with an approximated version of the image. The enhanced map is generated by applying noise reduction to the difference between the raw and approximated images. The approximate image is formed from the raw image. The resulting enhanced image that is the pixel-by-pixel sum of intensity values of the enhanced map and approximated image.

Kamei discloses processing a grayscale image by applying intensity mapping functions to the raw grayscale image to obtain image edge information. The image mapping function consists of performing histogram equalization on the raw image. An image edge operator characterizes the image edges using the edge information.

In independent claims 1, 6, 11, and 16, Applicant claims approximating a brightness map from a bi-linear interpolation of the raw image. The Examiner equates Applicant's brightness map with either Ancharya's enhanced map or the precursor to

Ancharya's approximated image. However, Ancharya's enhanced map is generated by applying noise reduction to the difference between the raw and approximated images. Furthermore, the precursor to Ancharya's image is the raw image, not a brightness map. In addition, Ancharya's raw image is <u>not approximated</u> from bi-linear interpolation of the raw image. Thus, Ancharya does not teach or suggest approximating a brightness map from a bi-linear interpolation as claimed.

Although, Kamei discloses using intensity mapping functions to provide edge information, Kamei does not teach or suggest approximating a brightness map from a bilinear interpolation of the raw image as claimed. Therefore, the combination of Acharya and Kamei cannot render obvious Applicant's claims 1, 6, 11, and 16 and claims 2-5, 7-10, 12-16, 18, and 19 that depend from them. Accordingly, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

Claims 17 and 20

Claims 17 and 20 stand rejected under 35 U.S.C. § 103(a) as being obvious over Acharya, Kamei, and Lathrop et. al. US Patent No. 6,288,743 (previously cited). Applicant respectfully submits that the combination of Acharya and Lathrop does not teach or suggest each and every limitation of Applicant's invention as claimed in claims 17 and 20.

Lathrop discloses an electronic still camera that processes raw captured images into finished files. The raw captured image is initially processed by a demosaicing step to generated a full color image (referred to in Lathrop as a color filter array interpolation). The image is subsequently subjected to edge enhancements before being stored in the camera's nonvolatile memory.

Claims 17 and 20 depend from independent claim 16. In independent claim 16, Applicant claims approximating a brightness map from a bi-linear interpolation of the raw image. As per above, neither Acharya nor Kamei teach or suggest this claim limitation. Furthermore, Lathrop is directed towards demosiaicing a raw image to produce a full color image and does not teach or suggest approximating a brightness map from a bi-linear interpolation of the raw image as claimed. Therefore, the combination cannot

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render obvious Applicant's invention as claimed in claim 16 and claims 17 and 20 that depend on them. Accordingly, Applicant respectfully requests the withdrawal of the rejection of the claims under 35 U.S.C. § 103(a) over the combination.

SUMMARY

Claims 1-20 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Eric Replogle at (408) 720-8300 x7514.

Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

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